

### REMARKS

The Office examined claims 2-10, 13-14 and 16-22, and all claims are rejected. With this response claims 14, 16 and 19-20 are amended to correct informalities. Applicant acknowledges that these claims are amended after a final rejection, but respectfully submits that the amendments are made to place the claims in better form, and do not change the scope of the claims. Accordingly, applicant submits that the amendments require no additional search or substantive examination by the Office, and respectfully requests entry of the amendments.

Applicant requests reconsideration and withdrawal of the rejections in light of the following discussion.

### Claim Objections

On page 2 of the Office Action, claims 16, 19 and 20 are objected to due to informalities. These claims, as well as claim 14, are amended to replace commas with semi-colons so that the separation between claim limitations are consistent within and between the claims. In view of the amendment, applicant respectfully requests withdrawal of the objections.

### Claim Rejections Under § 103

At section 6, on page 3 of the Office Action claims 2-10, 13-14 and 16-22 are rejected under 35 U.S.C. § 103(a) as unpatentable over Andrews et al. (U.S. Patent No. 6,105,062) in view of Jonsson et al. ("SyncML—Getting the Mobile Internet in Sync," Ericsson Review No. 3, 2001). With respect to independent claim 18, applicant respectfully submits that claim 18 is not disclosed or suggested by the cited references, alone or in combination, because the cited references at least fail to disclose a "fixed object type has a fixed title" and a "run-time object has a title defined during run-time."

Claim 18 recites a method of providing an object structure comprising several objects in order to produce a node structure, which for example could be a device management tree or application related information. Andrews discusses the application of containment rules to a hierarchical data structure, while claim 18 addresses defining containment rules for a hierarchical data structure on the basis of an object structure.

Andrews describes a methodology that allows copying or moving of directory subtrees, i.e. part of a hierarchical tree being constituted of hierarchically arranged object, to another

directory tree or within the same tree. Each object within the directory tree has an object type, which is defined in correspondence with the hierarchical level. Starting from the root object the computer network is modeled in view of a company organization chart in which the different objects include organization-type container object type, i.e. geographical organization units such as North America, Canada, Europe, etc., organization object type, i.e. units such as Engineering, Marketing, etc., and network type entity, i.e. network entity such as printer, computer, etc. Containment rules are defined that guarantee that an object of the organization-type object type is not arranged hierarchically subordinate to an object of the organization object type.

Claim 18 recites that a plurality of objects comprises different types of objects out of a group including at least a fixed object, a run-time object, a leaf object, and a link object. Andrews does not disclose or suggest either a fixed object or a run-time object. In responding to applicant's previously arguments, the Office asserts that the UNRESTRICTED object type discussed in Andrews is the equivalent of the fixed object type recited in claim 18, and that claim 18 does not recite "an object type that has a fixed title."

First, with regards to the Office's assertion that applicant has argued new claim language, applicant respectfully points out that claim 18 recites that a fixed object is an object type that has a fixed title, because claim 18 specifically recites "wherein said fixed object type has a fixed title." Therefore, applicant was merely pointing out that regardless of the name given to an object type in Andrews, Andrews does not disclose or suggest any object types that have a fixed title, and therefore cannot disclose or suggest the fixed object type recited in claim 18.

Second, the UNRESTRICTED object type discussed in Andrews is not the equivalent of the fixed object type that has a fixed title. Andrews does not disclose or suggest that the UNRESTRICTED object type has a fixed title. Instead, the UNRESTRICTED object is created from an existing object if the existing object would violate the containment rules, because the UNRESTRICTED object type is a special object type that can exist anywhere in a tree without violating containment rules. See Andrews column 8, lines 30-33. In contrast, if a naming conflict exists in Andrews, the name of the object is modified to eliminate the conflict. See Andrews column 8, lines 24-26. It is apparent from the teachings of Andrews that resolving naming conflicts and complying with containment rules are two separate problems addressed in Andrews. See column 8, lines 63-64. Since every object type discussed in Andrews may need to be renamed during a move, none of the objects discussed in Andrews are fixed object types that

have a fixed title, as recited in claim 18. Therefore, it is irrelevant if an UNRESTRICTED object type may not violate containment rules, because this is an entirely different problem than the naming problem addressed by Andrews, which is solved in Andrews by renaming objects that cause naming conflicts. For at least this reason, claim 18 is not disclosed or suggested by the cited references.

Furthermore, the cited references also fail to disclose or suggest a run-time object that has a title defined during run-time, as recited in claim 18. With respect to the run-time object, the Office asserts that running programs executing in a run-time environment disclose a run-time object, because the process is interpreted to be a running instance of a program. However, Andrews only discloses that an embodiment of the invention may be program instructions that execute in a run-time environment. See Andrews column 5, lines 58-61. Andrews is only discussing the operation of the methodology according to the invention discussed in Andrews, and makes no mention of a run-time object. It is irrelevant that process may be interpreted to be a running instance of a program, because a program for carrying out the invention according to Andrews is completely distinct from a run-time object recited in claim 18. Therefore, Andrews does not disclose or suggest a run-time object as recited in claim 18. For at least this additional reason, claim 18 is not disclosed or suggested by the cited references.

Independent claims 19-22 contain limitations similar to those recited in new claim 18, and for at least the reasons discussed above in relation to claim 18, are not disclosed or suggested by the cited references. As such, claims 19-22 are not disclosed or suggested by the cited references.

Dependent claims 2-10, 13-14 and 16-17 depend from a independent claim, and therefore are patentable at least in view of their dependencies.

In addition, with respect to claim 2 a renaming as discussed by Andrews in order to eliminate conflicts in a directory tree is not the equivalent to a rejection of an object definition, which results in an omission of the object definition, i.e. the object is not defined and not included. Furthermore, with respect to claim 3, Andrews fails to disclose or suggest a substitution of two objects by a new object. The Office asserts on page 21 of the Office Action that claim 3 does not recite this limitation. However, claim 3 specifically recites "concentrating said parent object and said new object by replacing said parent object and said new object with one combined new object." Therefore, the parent object and new object are replaced, i.e.

substituted, by the new combined object. In contrast, Andrews describes the maintaining of all objects, and if necessary the modifying of the object such that the directory structure complies with the containment rules. Therefore, for at least these additional reasons, claims 2 and 3 are not disclosed or suggested by the cited references.

#### Conclusion

The objections and rejections of the Office Action having been obviated by amendment or shown to be inapplicable, withdrawal thereof is requested, and passage to issue of the present application is earnestly solicited. The undersigned believes that no additional fee is required to submit this response, but hereby authorizes the Commissioner to charge deposit account 23-0442 for any fee deficiency required to submit this response.

Respectfully submitted,



Date: 22 January 2007

Keith R. Obert  
Attorney for the Applicant  
Registration No. 58,051

KRO/kas  
WARE, FRESSOLA, VAN DER SLUYS  
& ADOLPHSON, LLP  
755 Main Street, P.O. Box 224  
Monroe, CT 06468  
Telephone: (203) 261-1234  
Facsimile: (203) 261-5676  
Customer No. 004955